Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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JUL 2 - 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of	)	
	)	
Implementation of the Pay	)	
Telephone Reclassification and	)	CC Docket No. 96-128
Compensation Provisions of the	)	
Telecommunications Act of 1996	)	

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REQUEST FOR LEAVE TO FILE LATE TABLE OF CONTENTS

The Georgia Public Communications Association ("GPCA") hereby requests leave to file, one day late, the table of contents to its comments filed yesterday, July 1, 1996, in the above-captioned proceeding. Counsel inadvertently omitted to prepare a table of contents for this filing. In addition, we are submitting a corrected version of the summary of GPCA's comments, which corrects a number of typographical errors. The corrected versions of the table of contents and summary are attached.

Since no substantive changes to GPCA's comments are involved, there is no possibility that any party will be prejudiced by the Commission's acceptance of this corrective filing.

July 2, 1996

Respectfully submitted,

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Georgia Public Communications Association
July 1, 1996

SUMMARY

Section 276(b)(1)(C) requires the Commission to establish safeguards that "at a minimum" are as stringent as the Computer III safeguards. But the Commission must go beyond these minimums given the Bell Operating Companies' ("BOCs") already entrenched position in payphones. Indeed, mergers between BOCs justify separate subsidiaries for the merged companies.

In reclassifying LEC payphones as CPE, the Commission must state with particularity how the BOCs must comply with the Computer III safeguards. The BOCs must make available unbundled answer supervision and flexible call rating based on the subscriber's specifications, as well as coin supervision.

Interconnection must begin from a basic dial tone line and add each feature on an unbundled basis. Further, it will be necessary to closely scrutinize and tariff at the federal level the functionalities used to support BOC "dumb" payphones since the BOCs will be motivated to price them at a discriminatorily low rate. In any event, all services must be priced using the same methodology. The BOCs must also make volume discounts available on an equal basis to "aggregations" of IPP providers. To allow these aggregations to obtain the same discounts, there must be a "trigger" point where a maximum discount kicks in.

Embedded inside wired should be available to all providers on an equal basis. There should be a uniform demarcation point for both embedded and new wire installations.

Fraud protection should be made available on an equal basis. Installation and maintenance and billing, collection and validation services must be available to IPP providers on the same basis as

to the LECs' payphone divisions. Per call tracking must also be available, as must joint marketing opportunities. As with discounts on services, commission payments must reach a maximum level at volumes that are achievable by aggregations of IPP providers.

The assets to be transferred out of the regulated books must include the contracts associated with the payphones. The contracts must be assigned an economic value to recover ratepayer equity and achieve competitive parity A number of valuation approaches are possible, including present valuation, appraisal and auctioning.

End user common line charges for IPPs should be put in the carrier common line fund under the same rationale that has allowed LEC EUCLs to be in CCL all these years.

The Commission should prescribe safeguards in each of the areas addressed by the NPRM. Other areas, including service order processing and interference with letters of agency, must also be addressed.

Compliance safeguards must include the submission of compliance plans, independent audits, and publicly available contracts with affiliates.

The Commission should apply all these safeguards to the non-BOC LECs, including GTE, Sprint, and Alltel.